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10 Attorneys for the United States of America

11
12 UNITED STATES DISTRICT COURT
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA
14 WESTERN DIVISION

15 JENI PEARSONS, et al.,

16 Plaintiffs,

17 v.

18 UNITED STATES OF AMERICA, et
19 al.,

20 Defendants.

No. 2:23-cv-07952-RGK-MAR

**STIPULATION TO EXTEND TIME TO
RESPOND TO INITIAL COMPLAINT
BY NOT MORE THAN 30 DAYS (L.R.
8-3)**

Complaint served: Oct. 16, 2023 (United
States) and Nov. 7, 2023 (Lynne Zellhart)
Current response dates: Dec. 15, 2023
(United States) and Jan. 8, 2024 (Lynne
Zellhart)
New response dates: Jan. 16, 2023 (United
States) and Feb. 7, 2024 (Lynne Zellhart)

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25 Counsel for plaintiffs Jeni Pearsons and Michael Storc (“Plaintiffs”) and
26 defendants United States of America (“United States”) and Lynne Zellhart (the United
27 States and Lynne Zellhart are hereinafter collectively referred to as the “Defendants”)
28 hereby enter into the following stipulation to extend defendants’ deadline to respond to

the Complaint. The stipulation is based on the following:

1. Plaintiffs served their Complaint on defendant United States on October 16, 2023 and on defendant Lynne Zellhart on November 7, 2023.

2. The United States' deadline to respond to the Complaint is December 15, 2023. Defendant Zellhart's deadline to respond to the Complaint is January 8, 2024.

3. The parties hereby stipulate that Defendants shall have an additional thirty (30) days to respond to the Complaint such that the United States' deadline to respond to the Complaint shall be January 16, 2024 and Lynne Zellhart's deadline to respond to the Complaint is February 7, 2024.

Dated: December 13, 2023 Respectfully submitted,

INSTITUTE FOR JUSTICE
Joseph Gay*
Robert Frommer*
Robert E. Johnson*

THE VORA LAW FIRM, P.C.
Lou Egerton-Wiley
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/s/ Joseph Gay

JOSEPH GAY
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Dated: December 13, 2023

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/s/ Jasmin Yang

JASMIN YANG
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Attorneys for the United States of America and
Lynne Zellhart

ATTESTATION UNDER LOCAL RULE 5-4.3.4

I, Jasmin Yang, am the ECF User whose ID and password are being used to file this **STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT BY NOT MORE THAN 30 DAYS (L.R. 8-3)**. In compliance with Local Rule 5-4.3.4(a)(2), I hereby certify and attest that Plaintiffs' counsel, Joseph Gay, has concurred in this filing.

DATED: December 13, 2023 */s/ Jasmin Yang*

JASMIN YANG

Assistant United States Attorney